

International Standards for Phytosanitary Measures
Pest Risk Analysis for Regulated Non-Quarantine Pests
United States' Comments
October, 2003

General: The United States finds this standard generally acceptable, however, we offer some comments to consider for the purpose of clarity.

Specific:

* *Comment: editorial for clarification* – Under Scope, 2nd sentence, change to read, “It describes the integrated processes to be used for risk assessment as well as the selection of risk management options to achieve an acceptable level of pest prevalence.”

Justification – The goal is to reduce pest levels to meet a set tolerance. The change clarifies the sentence.

* *Comment: substantive deletion* – In the Definitions and Abbreviations section delete the new terms for “pest risk assessment (for RNQP)”, and “pest risk management (for RNQP).”

Justification – We do not believe new definitions are needed for specifically for RNQPs. The terms should be generic.

* *Comment: substantive addition* – In the title for Section 3 add the heading “Specific Requirements”.

Justification: This provides for a smoother transition between the General Requirements section and this section which provides specific guidance.

* *Comment: substantive addition* – In Section 3.1 add a fourth bullet, “to determine the strength of measures to be applied where a RNQP is known (i.e. from a certification scheme).”

Justification – In most cases, RNQPs will not be discovered as a result of a pest or commodity PRA but rather will be known at the outset. The initiation stage should, therefore, refer to the more common situation where the pest is already known and the PRA is really being done to justify the policy decision and to determine the strength of measures that can be applied.

* *Comment: editorial* – In Section 3.1.2, second dash, second bullet, change to read, “change in pest status (e.g. the distribution of the pest no longer meets the definition to qualify as a quarantine pest).”

* *Comment: substantive addition* – add another sentence after the last bullet, “In situations where it is economically desirable to facilitate trade, a quarantine pest may be regulated as a RNQP as long as domestic and port of entry requirements are equivalent.”

Justification: It may be advantageous for a country to skip trying to keep a pest out as a quarantine pest and go straight to regulating it as a RNQP.

* *Comment: substantive addition* – in Section 4 add another sentence to the end of the last paragraph, “The information supporting RNQP status should be explicitly summarized in the PRA document.”

Justification: This provides more guidance as to what is expected in the document.

* *Comment: editorial for clarification* – Change Section 4.1.1.3 to read, “If the pest is not under official control in the PRA area in the identified plants for planting with the same intended use, then the PRA stops at this point unless the pest is expected to be under official control in the near future. When an official control program is under consideration, the PRA should document the current situation as far as practicable.”

Justification: This makes it clearer that the PRA should not continue unless an official control program is in place.

* *Comment: editorial for clarification* – In 4.1.2, second sentence, change “may” to “should.”

Justification: If the criteria are not met to qualify as a RNQP, then there is no reason to continue with the PRA.

* *Comment: editorial for clarification* – In Section 4.2.1. last paragraph, both sentences, replace the word “transmission”, with “infestation and spread.”

Justification – We believes this aligns better with the first paragraph and includes the idea of spread. Spread is an important factor which is not mentioned. Spread potential could be an important aspect of a RNQP if it cannot be managed. This needs to be considered up-front in the assessment to be sure that the pest is a legitimate RNQP.

* *Comment: editorial for consistency* – Change the title in 4.3.1 to “Economic Impacts of Pests.”

Justification: The new heading better reflects the information presented, i.e. economic impact.

* *Comment: technical* – delete the 3rd paragraph in Section 4.3.1

Justification – This paragraph seems to expand the concept of a RNQP away from the designated plants for planting with their intended use concepts to secondary economic effects that could become major on other commodities.

* *Comment: editorial* – Section 4.5, 3rd paragraph, change to read, “Where plants for planting have been identified as the main source of infestation for a pest and an unacceptable economic impact on the intended use of those plants was demonstrated, pest risk management may be considered as appropriate (stage 3). The prior evaluations, together”

Justification – clarifies the pest risk management component.

* *Comment: editorial for clarification* – Change Section 5.1 to read, The decisions to be made in the pest risk management process will rely on the pest biological information presented in the preceding stages of the PRA.”

Justification – the phrase “will be based” sets up an exclusive or limited list that does not seem to include pest biology.

* *Comment: substantial addition* – In Section 5.4, add a sentence after the first sentence to read, “Tolerance is a level of a RNQP above which an unacceptable economic impact occurs.”

Justification – this helps to clarify the use of tolerance of pests in a population versus tolerance in a testing situation.

* *Comment: editorial* – In Section 5.4, bullet add, “(with confidence intervals)” after “sampling, and “(with estimates of precision of the methods)” after “detection.”

Justification – helps to further clarify the tolerance issue.

* *Comment: editorial, addition for clarification* – In Section 5.5, add “(see section 3.4 of ISPM 11 for information on the identification and selection of appropriate risk management options).”

Justification – links to ISPM 11 where the options are explained in detail.

Comment: editorial – In Section 5.6, 1st paragraph, last sentence, change to read, “Appropriate measures may be developed into Phytosanitary regulations or requirements.”

Justification – this allows for the possibility that a country decides to allow the unmitigated plants for planting to enter despite the findings in the PRA.

* *Comment: editorial for clarification* – In Section 5.6, second paragraph, 3rd sentence add, “in the PRA” after “but may be included”

Justification – clarifies where to include the information.

* *Comment: technical* – In Section 6.1, delete the 7th bullet, “options selected”.

Justification – “options selected” should not be a part of the PRA documentation, since these are often negotiated long after the PRA document is completed. The final regulation ultimately may use different measures after country consultation. If the mitigations section of the PRA document ends by identifying options, then the door is open for negotiation.